

Arnold & Porter

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October 22, 2021

VIA ECF & E-MAIL

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *In re: GE/CBPS Data Breach Litigation*, No. 20-cv-02903-KPF

Dear Judge Failla:

On behalf of Defendants General Electric Company and Canon Business Process Services, Inc., we write, jointly with Plaintiffs' counsel (collectively, the "Parties"), to update the Court on the status of the Parties' preliminary settlement discussions, as requested by the Court (ECF No. 74), and to request a further 60-day stay of the case.

The Parties have exchanged multiple drafts of a settlement term sheet and continue to negotiate productively in an effort to resolve this matter. Given their progress to date, the Parties jointly request a further 60-day stay of the case (including any pending deadlines pursuant to the Court's Opinion and Order, ECF No. 72) to allow the Parties to continue to negotiate in good faith and to preserve the Parties' and the Court's resources and avoid burdening the Court and Parties with potentially unnecessary litigation practice during that time. The Parties agree to submit an additional status report no later than 60 days from the date of this letter.

The Parties previously requested a 60-day stay to engage in settlement discussions on August 26, 2021, which was granted by the Court (ECF No. 74). That stay expires on October 25, 2021.

Respectfully Submitted,



Kenneth L. Chernof

Copies to: All Counsel Of Record (via ECF)

Application GRANTED.

This case is STAYED through **December 21, 2021**. The parties shall submit a further joint status update on or before **December 21, 2021**.

The Clerk of Court is directed to terminate the motion at docket entry 75.

Dated: October 25, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE